

1 THE HONORABLE RICARDO S. MARTINEZ
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 PROMEDEV, LLC dba RELIEF FACTOR,

11 Plaintiff,

12 v.

13 AGE RELIEF, LLC; and MICHAEL JOSEPH
14 REDMOND,

Defendants.

CASE NO. 2:22-cv-01824-RSM

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

**NOTE ON MOTION CALENDAR:
Tuesday, January 17, 2023**

15 Plaintiff Promedev, LLC dba Relief Factor (“Plaintiff”) and defendants Age Relief, LLC
16 and Michael Joseph Redmond (“Defendants”) (collectively, the “Parties”), by and through their
17 respective counsel, hereby stipulate and agree as follows:

18 WHEREAS, Plaintiff filed its Complaint on December 28, 2022;

19 WHEREAS, Defendants were served with the Complaint on December 30, 2022, making
20 their current response deadline January 20, 2023;

21 WHEREAS, Defendants’ counsel were recently retained and are currently evaluating the
22 underlying facts, Plaintiff’s allegations, as well as potential defenses;

23 WHEREAS, Defendants have not previously sought any extension of time;

24 WHEREAS, the Parties agree to extend the deadline by which Defendants may respond to
25 the Complaint to February 17, 2023;

26 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED TO BY THE PARTIES,
27 that Defendants may have until February 17, 2023 to file and serve a response to the Complaint.

STIPULATION AND ORDER TO EXTEND
DEADLINE TO RESPOND TO COMPLAINT - 1
CASE NO. 2:22-cv-01824-RSM

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1 RESPECTFULLY SUBMITTED on this 17th day of January, 2023.

2 **GOLDFARB & HUCK ROTH RIOJAS, PLLC**

3 /s/Kit W. Roth
4 Kit W. Roth, WSBA No. 33059

5 /s/R. Omar Riojas
R. Omar Riojas, WSBA No. 35400

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15 Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically with the Clerk of the Court using the CM/ECF system on January 17, 2023 and was served via the Court's CM/ECF system on all counsel of record.

/s/ Kit W. Roth
Kit W. Roth, WSBA No. 33059